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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

SHAUNTELLE MARIE LEE,	)	
	)	
Plaintiff,	)	CASE NO.
	)	2:23-cv-00326-BNW
v.	)	
	)	<b>CONSENT MOTION</b>
	)	<b>FOR EXTENSION OF TIME TO FILE</b>
KILOLO KIJAKAZI, ACTING	)	<b>PLAINTIFF'S BRIEF</b>
COMMISSIONER OF SOCIAL SECURITY,	)	
	)	
Defendant.	)	
_____	)	

Plaintiff by her attorney, moves for a sixty-one (61) day extension of time to file Plaintiff's opening brief. Plaintiff's opening brief is currently due to be filed May 31, 2023.

Counsel requests this extension due to multiple, simultaneous filing deadlines. Counsel requires additional time to properly and thoroughly prepare Plaintiff's brief. For instance, between May 26, and July 26, 2023, staff in Counsel's office have one hundred and ninety-nine (199) Plaintiff briefs due. This figure does not include Oral Arguments, appeals to Circuit Courts, Reply Briefs, settlement negotiations, and the various other tasks which arise throughout the course of litigation. These circumstances do not allow for Plaintiff's Counsel to properly prepare the brief by the current deadline. This request will not cause Defendant any undue

1 hardship. This extension is needed to thoroughly and properly prepare the brief by the current  
2 deadline.

3 Wherefore, Plaintiff requests an extension from May 31, 2023, up to and including July  
4 31, 2023 to file their brief. Counsel for the Plaintiff has conferred with Defendant's Counsel who  
5 kindly consents to this request.  
6

7 Dated May 24, 2023.

8 Respectfully submitted,

9 /s/Hal Taylor

10 Hal Taylor, Esq.

11  
12 **Plaintiff's Certificate of Service:**

13 I certify that I caused the Unopposed Motion for Extension of Time to be served today,  
14 May 24, 2023, by CMECF to Blaine T Welsh, and Oscar Gonzalez De Llano, who are filing  
15 users of the CM/ECF system.  
16

17 /s/Hal Taylor

18 Hal Taylor

19  
20 **IT IS SO ORDERED**

21 **DATED:** 8:47 pm, May 25, 2023

22  
23 

24 **BRENDA WEKSLER**  
25 **UNITED STATES MAGISTRATE JUDGE**  
26  
27  
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